

# Exhibit 3

## Redacted Version of Document Filed Under Seal

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

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WAYMO LLC,

Plaintiff,

vs.

No. 3:17-cv-00939-WHA

UBER TECHNOLOGIES, INC.;

OTTOMOTTO LLC; OTTO TRUCKING,

INC.,

Defendants.

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WAYMO & UBER CONFIDENTIAL ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF CAMERON POETZSCHER

SAN FRANCISCO, CALIFORNIA

MONDAY, JUNE 19, 2017

BY: ANDREA M. IGNACIO,  
CSR, RPR, CRR, CCRR, CLR  
CSR LICENSE NO. 9830  
JOB NO. 2642012

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11:35

25	MR. JACOBS: Objection --	11:35
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1 Q Who is [REDACTED]? 16:32

2 A I don't know. 16:32

3 Q Who is [REDACTED]? 16:32

4 A I know he's an employee of Otto. I recognize 16:32

5 the name. 16:32

6 Q And do you -- other than knowing he is an -- 16:32

7 an employee of Otto, do you know anything else about 16:32

8 him? 16:32

9 A No. 16:32

10 And when I say "employee of Otto," he's now 16:32

11 an employee of Uber, of course, but he was an employee 16:32

12 of Otto. 16:32

13 Q Right. 16:32

14 Was he formerly employed at Waymo? 16:32

15 A I don't know. 16:32

16 Q But for [REDACTED] and [REDACTED] you don't know -- 16:32

17 you don't recognize those names as Otto employees? 16:32

18 A No. 16:32

19 Q And you don't recognize those names as 16:32

20 members of the team that Anthony Levandowski brought 16:32

21 to Otto? 16:32

22 A No. 16:32

23 Q And is it correct that, under the terms of 16:32

24 the indemnification agreement, Uber agreed to 16:32

25 indemnify the signatories in the event of certain 16:32